

FILED

MAY 25 2022

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMIE JEFFREY,

Defendant.

4:22CR300 HEA/NAB

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and J. Christian Goeke, Assistant United States Attorneys for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with being a Felon in Possession of a Firearm in violation of 18 U.S.C. § 922(g)(1), an offense for which a maximum 10-year imprisonment is prescribed under Title 18, Possession of Marijuana with Intent to Distribute in violation of 21 U.S.C. § 841(a)(1) and Possession of Firearms in Connection with Drug Trafficking Crimes in violation of 18 U.S.C. § 924(c).

2. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the

community.

3. According to St. Louis County Police Department complaint number 22-7536, on March 1, 2022, officers with the St. Louis County Police Department initiated a traffic stop of a 2008 Bentley for Improper Lane Change. The officers made contact with the occupants, the driver, later identified as Defendant and a front seat passenger. As they did so, one of the officers observed in the backseat a box that contained a bag of suspected marijuana. Both occupants were removed from the vehicle. As Defendant was removed, he advised that there were two guns inside, one on the driver's side floorboard and one in the back seat area. The officers searched the vehicle and located under the floor mat on the driver's side floorboard a Ruger model 57 5.7 caliber semi-automatic pistol with a large capacity magazine loaded with 20 rounds of live ammunition and located in the rear seat area a Taurus 45/410 caliber revolver. The officers also seized fourteen bags of marijuana totaling 6 kilograms.

Defendant was transported to the St. Louis County Justice Center where he was advised of his rights per the *Miranda* decision. During an audiotaped interview, Defendant admitted to possession of both firearms and all of the marijuana. Defendant advised that the marijuana was the residual of 100 pounds of marijuana he had obtained in California in November 2021 in trade for a 1969 Firebird. He further advised that he had traded marijuana for the two firearms in September or October 2021.

4. According to arrest records, the defendant's criminal history, which includes convictions for Possession of a Controlled Substance for Sale, Possession of Marijuana for Sale and Assault with a Deadly Weapon with Force which shows a pattern of similar conduct and the nature and circumstances of the offense charged, which included possession of a large amount of marijuana while armed with a loaded firearm with a large capacity magazine, reflects that there is a serious

danger to the community that would be posed by the defendant's release.

5. Due to the weight of the evidence against defendant and defendant's history and characteristics, which includes prior convictions that may result in a determination that Defendant is an armed career criminal, there is a serious risk that the defendant will flee.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,
SAYLER A. FLEMING
United States Attorney

/s/ J. Christian Goeke
J. CHRISTIAN GOEKE, #39462(MO)
Assistant United States Attorney